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Attorney for Defendant Kelly Keays

## IN THE UNITED STATES DISTRICT COURT FOR THE DISTRICT OF ALASKA

Case No.: 3:19-cv-00311-SLG

CONOCOPHILLIPS ALASKA, INC.

Plaintiff,

VS.

FORREST WRIGHT; AMANDA WRIGHT; NATHAN KEAYS; KELLY KEAYS; ECO EDGE ARMORING, LLC; DAVID BENEFIELD; WRIGHT CAPITAL INVESTMENTS, LLC; and DB OILFIELD SUPPORT SERVICES,

Defendants.

## DECLARATION OF JEFFREY W. ROBINSON IN SUPPORT OF MOTION FOR EXPEDITED CONSIDERATION OF MOTION TO PERMIT COUNSEL TO APPEAR TELEPHONICALLY

- I, Jeffrey W. Robinson, declare and state as follows:
- 1. I represent Kelly Keays and am fully familiar with the facts stated herein.
- 2. Counsel for Ms. Keys has filed a Motion to Permit Counsel to Appear Telephonically in the above-captioned matter. Tim Lamb, counsel for ConocoPhillips,

does not oppose this motion. As of the date of this filing, no other attorneys of record

have entered their appearance in this matter, although we will provide notice to other

parties as identified in Paragraph 4 of Docket 13.

3. Expedited consideration of the Motion to Permit Counsel to Appear

Telephonically is necessary because the hearing is scheduled for December 26, 2019 and

undersigned counsel will be in California on that date.

4. Undersigned made travel plans several months ago to visit family during

the Christmas break. The court's order setting the injunction hearing issued on December

13, 2019. Docket 9 at 10. Counsel received Plaintiff's ex-parte motion and associated

motions on December 18, 2019. It is critical that I participate in this hearing at the behest

of my client, although my colleague, Laura Dulic, will attend the proceeding in person

with Ms. Keays.

ASHBURN & MASON, P.C.

Attorneys for Kelly Keays

DATED: 12/19/19

By:

s/ Jeffrey W. Robinson

JEFFREY W. ROBINSON

Alaska Bar No. 0805038

DECLARATION OF JEFFREY W. ROBINSON

ConocoPhillips Alaska, Inc. v. Forrest Wright et al., Case no. 3:19-cv-311-SLG

Page 2 of 3

## **CERTIFICATE OF SERVICE**

I HEREBY CERTIFY that on December 19, 2019, a copy of the foregoing was served electronically through the CM/ECF system on the following:

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Timothy J. Lamb
Delaney Wiles
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ASHBURN & MASON, P.C.

By: s/Jeffrey W. Robinson

JEFFREY W. ROBINSON

By: s/Laura C. Dulic
LAURA C. DULIC